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individual companies. However, certain general comments can be made concerning the conclusions of the HHS report.

First, HHS criticizes the use of ingredients simply because of the number of ingredients used. Yet many thousands of ingredients are used in food products, and this food usage has not been a cause for significant criticism. The issue is not the number of ingredients used. Rather, the issue should be the safety of ingredients that are used.

Moreover, the emphasis on the number of ingredients used obscures the fact that about 20 ingredients account for approximately 99 percent of total ingredient usage. A number of these 20 compounds are processing aids that are found in the final cigarette, if at all, in extremely small and often undetectable amounts. Others are casing materials, flavoring materials or moisturizers that have been used in cigarettes for decades.

Most ingredients are used in small quantities, in many cases less than 10 pounds per year for the entire American industry. Most of these ingredients are components of formulated flavor mixtures purchased by the cigarette manufacturers from flavor suppliers. Only a small number of flavor ingredients would be present in an individual brand, and all of these ingredients generally constitute less than a tenth of a percent by weight of the individual cigarette.

Most ingredients used in cigarette manufacture in the United States are commonly used in foods and have been

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DRAFT RESPONSE OF INDUSTRY UPON RELEASE
OF A CRITICAL REPORT CONCERNING INGREDIENTS

On _____, the Department of Health and Human Services released a report concerning the use of ingredients added to tobacco in the manufacture of cigarettes. This report was prepared pursuant to Section 7 of the Federal Cigarette Labeling and Advertising Act.

The report unjustifiably criticizes the use of ingredients in the manufacture of cigarettes. In preparing the report, HHS failed adequately to consider available scientific data in a dispassionate and unbiased manner. It is unfortunate that what was intended to be a serious scientific inquiry that could have identified any real cause for concern did not achieve this objective.

In preparing the report, HHS declined the repeated offers of the cigarette manufacturers to work with HHS to produce a balanced and complete report on the use of ingredients. Since 1979, the industry has offered to cooperate with HHS in a scientific evaluation of the use of ingredients. These offers were rejected, and HHS prepared its report without the benefit of the knowledge and experience of the people who know most about the use of ingredients in cigarettes. This resulted in an unbalanced report.

The Act recognizes that ingredient information is an important trade secret. It therefore would be inappropriate for us to comment on the use of particular ingredients by

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The tobacco industry remains committed to engaging in serious scientific discussions with responsible authorities interested in approaching the ingredients issue from a scientific prospective. We regret that HHS has not seen fit to adopt such an approach in this instance.

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reviewed by the Food and Drug Administration. Many are included in the list of substances generally recognized as safe maintained by FDA and the Flavor Extract Manufacturers Association. Many ingredients are also used in other consumer products such as cosmetics.

Despite these approvals, HHS contends in its report that certain compounds that are natural extracts present a health risk to consumers, because natural extracts may contain some natural impurities. Yet, such extracts are routinely used in food products, and are approved for such use by the Food and Drug Administration.

Many of the ingredients also have been approved for use in tobacco products by governmental bodies in other countries, such as Great Britain and West Germany. For example, a British list, commonly referred to as the Hunter-Frogett List, was developed by a medical and scientific committee appointed by the British government.

Despite this evidence, the report criticizes the use of ingredients because of what it characterizes as a lack of evidence concerning safety. This statement is not accurate. The companies are satisfied that ample scientific data are available -- particularly concerning the major ingredients that comprise 99 percent of the total poundage of ingredients used -- to demonstrate that the use of these ingredients in cigarettes has no adverse health effects.

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